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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT  
 ADDICTION/PERSONAL INJURY  
 PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

*R.B. and A.B. v. Snap Inc.*, 4:24-cv-04083;

*K.G. and N.F. v. Snap Inc., et al.*, 4:24-cv-04086;

*K.K. and K.A. v. Meta Platforms, Inc. et al.*, 4:24-cv-04425;

*K.K. and C.K. v. Meta Platforms, Inc. et al.*, 4:24-cv-04426;

*C.S., filed on behalf of minor T.P. v. Meta Platforms, Inc. et al.*, 4:24-cv-04495;

*M.M., filed on behalf of minor A.B. v. Meta Platforms, Inc., et al.*, 4:24-cv-04578;

*K.N., filed on behalf of minor A.N. v. Meta Platforms, Inc., et al.*, 4:24-cv-05161;

*S.C., filed on behalf of minor D.G. v. Meta Platforms, Inc., et al.*, 4:24-cv-05178;

*C.C., filed on behalf of minor L.C. v. Meta Platforms, Inc., et al.*, 4:24-cv-05369;

**PLAINTIFFS' ELEVENTH  
 CONSOLIDATED EX PARTE  
 APPLICATION FOR APPOINTMENT OF  
 GUARDIANS AD LITEM**

1 *C.D., on behalf of C.F. v. Meta Platforms,*  
 2 *Inc. et al., 4:24-cv-06506;*

3 *J.H., filed on behalf of minor M.H. v. Meta*  
 4 *Platforms, Inc., et al., 4:24-cv-06613;*

5 *B.B., filed on behalf of minor O.B. v. Meta*  
 6 *Platforms, Inc., 4:24-cv-06139;*

7 *L.J. and B.J. v. Meta Platforms, Inc. et al.,*  
 8 *4:24-cv-06722;*

9 *J.G., individually and on behalf of Z.J. v.*  
 10 *Meta Platforms, Inc. et al., 4:24-cv-06723;*

11 *B.D., on behalf of Z.H. v. Meta Platforms,*  
 12 *Inc. et al., 4:24-cv-06727;*

13 *D.C., on behalf of T.S. v. Meta Platforms,*  
 14 *Inc. et al., 4:24-cv-06728;*

15 *D.C. and E.B v. Snap Inc. et al., 4:24-cv-*  
 16 *06729;*

17 *R.Z., filed on behalf of minor C.Z. v. Meta*  
 18 *Platforms, Inc. et al., 4:24-cv-06641.*

### 19 APPLICATION

20 Pursuant to this Court’s Order Regarding Appointment of Guardian *Ad Litem* (“Guardians  
 21 *Ad Litem* Order”) (ECF No. 122 at 3), Plaintiffs’ Liaison Counsel, Jennie Lee Anderson, hereby  
 22 submits Plaintiffs’ Eleventh Consolidated *Ex Parte* Application for Appointment of Guardians *Ad*  
 23 *Litem* (“*Ex Parte* Application”) for this Court’s consideration.

24 “Fit parents are presumed to act in the best interests of their children.” *J.B. by &*  
 25 *Through Billiet v. Tuolumne Cnty. Superintendent of Sch.*, No. 19-cv-0858-NONE-EPG, 2021  
 26 WL 3115195, at \*2 (E.D. Cal. July 22, 2021) (citing *Troxel v. Granville*, 530 U.S. 57, 66 (2000);  
 27 *Doe v. Heck*, 327 F.3d 492, 521 (7th Cir. 2003)); *see also Brown v. Alexander*, No. 13-cv-01451-  
 28 RS, 2015 WL 7350183, at \*1 (N.D. Cal. Nov. 20, 2015) (“In general, a parent who is also a party  
 to the lawsuit is presumed to be a suitable guardian ad litem, and so the court often appoints the  
 parent as guardian ad litem upon receipt of an ex parte application without exercising much  
 discretion.”) (citation omitted). Absent a conflict of interest, “[a] parent is generally appointed

guardian *ad litem*.” *A.G. v. South Bay Dreams Coop., Inc.*, No. 16-cv-02598-RNB, 2018 WL 2002370, at \*3 (S.D. Cal. Apr. 30, 2018) (citing *Anthem Life Ins. Co. v. Olguin*, No. 06-cv-01165-AWI NEW (TAG), 2007 WL 1390672, at \*3 (E.D. Cal. May 9, 2007)); *accord J.M. v. Liberty Union High Sch. Dist.*, No. 16-cv-05225-LB, 2016 WL 4942999, at \*2 (N.D. Cal. Sept.16, 2016). However, “[w]hen there is a potential conflict between a perceived parental responsibility and an obligation to assist the court in achieving a just and speedy determination of the action, a court has the right to select guardian ad litem who is not a parent if that guardian would best protect the child’s interests.” *J.M.*, 2016 WL 4942999, at \*1 (citations omitted) (internal quotation marks omitted).

Attached as Exhibits 1-18 to the Declaration of Jennie Lee Anderson in Support of Plaintiffs’ Eleventh Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“Anderson Decl.” or “Anderson Declaration”) are the *Ex Parte* Applications for Appointment of Guardians *Ad Litem* (“Applications”) submitted by the parents and/or legal guardians of individual minor Plaintiffs in the following cases.

- *R.B. and A.B. v. Snap Inc.*, 4:24-cv-04083 (Exhibit 1)
- *K.G. and N.F. v. Snap Inc., et al.*, 4:24-cv-04086 (Exhibit 2);
- *K.K. and K.A. v. Meta Platforms, Inc. et al.*, 4:24-cv-04425 (Exhibit 3);
- *K.K. and C.K. v. Meta Platforms, Inc. et al.*, 4:24-cv-04426 (Exhibit 4);
- *C.S., filed on behalf of minor T.P. v. Meta Platforms, Inc. et al.*, 4:24-cv-04495 (Exhibit 5);
- *M.M., filed on behalf of minor A.B. v. Meta Platforms, Inc., et al.*, 4:24-cv-04578 (Exhibit 6);
- *K.N., filed on behalf of minor A.N. v. Meta Platforms, Inc., et al.*, 4:24-cv-05161 (Exhibit 7);
- *S.C., filed on behalf of minor D.G. v. Meta Platforms, Inc., et al.*, 4:24-cv-05178 (Exhibit 8);
- *C.C., filed on behalf of minor L.C. v. Meta Platforms, Inc., et al.*, 4:24-cv-05369 (Exhibit 9);

- 1 • *C.D., on behalf of C.F. v. Meta Platforms, Inc. et al.*, 4:24-cv-06506 (Exhibit 10);
- 2 • *J.H., filed on behalf of minor M.H. v. Meta Platforms, Inc., et al.*, 4:24-cv-06613
- 3 (Exhibit 11);
- 4 • *B.B., filed on behalf of minor O.B. v. Meta Platforms, Inc.*, 4:24-cv-06139 (Exhibit 12);
- 5 • *L.J. and B.J. v. Meta Platforms, Inc. et al.*, 4:24-cv-06722 (Exhibit 13);
- 6 • *J.G., individually and on behalf of Z.J. v. Meta Platforms, Inc. et al.*, 4:24-cv-06723
- 7 (Exhibit 14);
- 8 • *B.D., on behalf of Z.H. v. Meta Platforms, Inc. et al.*, 4:24-cv-06727 (Exhibit 15);
- 9 • *D.C., on behalf of T.S. v. Meta Platforms, Inc. et al.*, 4:24-cv-06728 (Exhibit 16);
- 10 • *D.C., and E.B v. Snap Inc. et al.*, 4:24-cv-06729 (Exhibit 17);
- 11 • *R.Z., filed on behalf of minor C.Z. v. Meta Platforms, Inc. et al.*, 4:24-cv-06641
- 12 (Exhibit 18).

13 Exhibits 1-18 to the Anderson Declaration are Applications submitted to Plaintiffs' Liaison  
 14 Counsel for filing since the last guardian *ad litem* submission. The Applications attached to the  
 15 Anderson Declaration as Exhibits 1-18 are consistent with Attachment A to this Court's Guardian  
 16 *Ad Litem* Order (ECF No. 122) and include (1) the applicant's name and contact information  
 17 (including address, email, and telephone number); (2) the name, case number, state of domicile  
 18 (and its minimum age of capacity); (3) a sworn statement that the applicant is the parent and/or  
 19 legal guardian of the minor plaintiff; and (4) a sworn statement affirming that the applicant is fully  
 20 competent and qualified to understand and protect the rights of the minor plaintiff and has no  
 21 interests adverse to the interests of that person. Anderson Decl. ¶ 21.

22 Pursuant to this Court's Guardians *Ad Litem* Order, the Applications by parents and/or  
 23 legal guardians in the cases listed above are deemed presumptively approved upon filing, as there  
 24 is no apparent conflict between the applicants' parental responsibility and their obligation to assist  
 25 the Court in "achieving a just and speedy determination of the action." ECF No. 122 ¶ 4 (citing  
 26 *J.M.*, 2016 WL 494299, at \*1). This Court also ordered that, absent the filing of an objection, the  
 27 presumptive approval shall become final fifteen days after the date this *Ex Parte* Application is  
 28 filed. ECF No. 122 ¶ 5. The fifteenth day in this instance falls on a Saturday, and Monday,

November 11, 2024, is a Court holiday. Therefore, the objection period will close on November 12, 2024.

Accordingly, Plaintiffs submit herewith a [Proposed] Order Granting *Ex Parte* Applications and Appointing Guardian *Ad Litem* appointing the parent and/or legal guardian named in the Applications submitted in the case listed above.

Dated: October 25, 2024

Respectfully submitted,

**ANDRUS ANDERSON LLP**

/s/ Jennie Lee Anderson

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